



February 25, 2020

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VIA ECF

District Judge Hon. Nelson S. Roman
Federal Building and United States Courthouse
300 Quarropas
White Plains, New York 10601-4150

Re: **Buono, Franklin v. Poseidon Air Systems, et al.**
Case No.: **7:17-cv-05915- NSR-LMS**

Dear Judge Roman:

This firm represents the interests of defendant/third party plaintiff Tyco Fire Products LP ("Tyco") in the above referenced product liability-personal injury lawsuit. We are writing, with the consent of all parties, to submit a joint application to adjourn the court conference scheduled to proceed before Your Honor on March 6, 2020 at 12:30 pm. Currently the parties are still in the midst of exchanging their respective experts' reports. The parties have not yet conducted any experts' depositions in this case. Magistrate Judge Smith has recently extended the deadline for the parties to complete expert discovery. As per Judge Smith's February 21st Order, all expert depositions must be completed by June 17, 2020. Accordingly, the parties respectfully request that Your Honor hold a status conference after June 17th, 2020 at which time the parties will be in a position to report to Your Honor on all of the anticipated issues we intend to address through dispositive motion practice or at trial.

Please contact the undersigned should Your Honor have any questions regarding this request.

Respectfully submitted,
Wilson Elser Moskowitz Edelman & Dicker LLP

Thomas M. DeMicco

TMD:oms

VIA ECF

cc: Lawrence D. Lissauer, Esq.
Kenneth Fromson, Esq.
Brian Acard, Esq.

Status Conf. scheduled for March 6, 2020 adjourned until June 26, 2020 at 11:30 am. Clerk of the Court requested to terminate the motion (doc. 136) - Dated: Feb. 27, 2020

SO ORDERED

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

USDC SDNY

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